



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SK/RCH/EMR/PP/MD  
F. #2019R00927

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 25, 2022

By ECF

The Honorable Brian M. Cogan  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Genaro Garcia Luna  
Criminal Docket No. 19-576 (BMC)

Dear Judge Cogan:

The government respectfully submits this letter in response to the Court's July 15, 2022, Order that the government provide the approximate volume of 18 U.S.C § 3500 material. To date, the government has already produced more than 6,100 pages of § 3500 material. Based on materials currently in the government's possession, the government anticipates that it will produce an additional 7,500 pages of § 3500 material, as well as

approximately five electronic devices of a cooperating witness and approximately 4,900 audio recordings of another cooperating witness.<sup>1</sup>

Respectfully submitted,

BREON PEACE  
United States Attorney

By:       /s/        
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cc: Cesar de Castro, Esq.  
Clerk of the Court (BMC) (by ECF)

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<sup>1</sup> The government notes that although it does not believe the audio recordings of this witness are likely § 3500 material because they will not “relate[] to the subject matter as to which the witness has testified,” the government intends to produce this material in an abundance of caution.